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**Attorneys for Plaintiffs**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF SAN DIEGO**

JANE DOE NOS. 1 - 22, inclusive, individuals;

Plaintiffs,

v.

GIRLSDOPORN.COM, a business organization, form unknown; MICHAEL J. PRATT, an individual; ANDRE GARCIA, an individual; MATTHEW WOLFE, an individual; BLL MEDIA, INC., a California corporation; BLL MEDIA HOLDINGS, LLC, a Nevada limited liability company; DOMI PUBLICATIONS, LLC, a Nevada limited liability company; EG PUBLICATIONS, INC., a California corporation; M1M MEDIA, LLC, a California limited liability company; BUBBLEGUM FILMS, INC., a business organization, form unknown; OH WELL MEDIA LIMITED, a business organization, form unknown; MERRO MEDIA, INC., a California corporation; MERRO MEDIA HOLDINGS, LLC, a Nevada limited liability company; and ROES 1 - 550, inclusive,

Defendants.

**LEAD CASE:**

Case No.: 37-2016-00019027-CU-FR-CTL

**CONSOLIDATED WITH:**

Case No.: 37-2017-00033321-CU-FR-CTL

Case No.: 37-2017-00043712-CU-FR-CTL

**DECLARATION OF PLAINTIFF JANE DOE NO. 6 IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT DOMI PUBLICATION LLC'S SPECIAL MOTION TO STRIKE [CCP §425.16]**

**Date:** August 31, 2018

**Time:** 9:00 a.m.

**Judge:** Hon. Joel R. Wohlfeil

**Location:** C-73

**DECLARATION OF JANE DOE NO. 6**

I, Jane Doe No. 6, declare as follows:

1. I am a plaintiff in the above-captioned action. I have personal knowledge of each fact stated in this declaration.
2. In May 2016, Defendants posted an advertisement on Craigslist.com in the gigs/modeling section for the Baton Rouge, Louisiana area, seeking young women for adult modeling. I responded to the advertisement and corresponded with defendant Andre Garcia ("GARCIA") (then going by his alias "Jonathan"). Our initial conversions were via text and/or email -- the following representations regarding distribution were conveniently by phone or in-person.
3. GARCIA told me that Defendants would not post the subject video online and they would not distribute the video in the United States. GARCIA told me the video would go to Australia - and would only be in DVD format. GARCIA had me speak with another woman, who assured me the videos do not get leaked.
4. Before the shoot, GARCIA, another man (going by "Ted"), and a makeup artist (going by "Riva") assured me they would not post the video online and they would not distribute the video in the United States. They assured her there was nothing to worry about, promised me privacy, and represented nobody I knew would see the videos. Moreover, GARCIA said Defendants had never had an issue with the videos getting release, going viral, or anyone seeing the videos in the United States.
5. Defendants continued to make the above representations before and simultaneous with providing me documents to sign. They rushed me and told me the documents merely reiterated what they already represented to me.
6. Before the video shoot, Defendants made me strip naked in front of everyone and take pictures with bright lights on me to get final approval for the video.
7. After the video shoot, Defendants did not pay me in full, as they represented.
8. Around August 2016, Defendants released my video on their website, [www.girlsdoporn.com](http://www.girlsdoporn.com), and other websites, which were then discovered by my family, friends, and people in my hometown.

9. As a result of the release of the video, I have suffered emotional distress damages (including loss of eating, loss of sleep, enduring fright, shock, nervousness, anxiety, depression, embarrassment, mortification, shame, and fear):

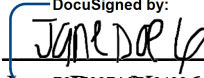
- a. I have contemplated suicide.
- b. I have cut myself.
- c. I became depressed, could not leave the house, and considered dropping out of school.
- d. People started to message me with video screenshots or they would send screenshots to my friends making fun of me.
- e. My mom knows of the video, which shames and humiliates me.
- f. I had to drop out of college to avoid ongoing harassment from classmates.
- g. I have been harassed at work about the video to the point that I had to quit. I am now scared to apply for new jobs.
- h. I get random requests on social media from strangers asking me to have sex with them.
- i. I live in fear every single day that I will run across someone that knows about the video.
- j. I am trying to move to another state soon.

10. I would never have agreed to the video, if Defendants had been truthful, told me their plan to release my video on their website, or told me I was in danger. I would never have agreed to the video, if Defendants had told me their website existed. I made a mistake trusting the Defendants – they are not truthful people.

11. Before and during this lawsuit, I made changes to my life to minimize the harassment and other damages the Defendants have caused me. In this lawsuit, I seek the Court's help in remedying the damages the Defendants have caused me. Unsealing the Court record will likely cause me even more harm and the harassment may exacerbate and/or resurface. Unsealing the Court record will worsen the very harm I have am seeking to now remedy.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: March 7, 2017

DocuSigned by:  
By:   
Jane Doe No. 6

# **Exhibit A**

## Re: Beautiful Collegiate Females Make 5K

[REDACTED]

From craigslist [REDACTED]

Hello [REDACTED], thank you for expressing interest in our ad, we receive many applicants, but only a select few get this reply as we are very picky about who we work with.

This is a legitimate adult gig for an established Southern California company. You will make \$4000 CASH for your first shoot which is paid up front, consistent work is also available, we offer solo toy scenes for \$1000. You can do BOTH scenes in one trip for \$5000.

This is a 30 minute adult video. Only the producer and talent are present during your shoot.

All shoots are held at a luxury upscale location with only 3 people, the male model, the director and yourself.

None of your personal information will be given out in the video or afterwards, no names etc are used in the video.

We have two male talent available that you can pick to work with, both are tested, in good shape, and under 25.  
Pictures of them are available.

You will not be working with any "agents" or agencies who are just the "middle man". This is directly through the production company.

Re: Cute College Types Needed As Models

From

craigslis

Hide

To

If you have questions/concerns or are reluctant to do this type of shoot it would be worth your while to hear the entire offer and get an understanding about what you would be doing and where the video or shoot content is distributed. We can talk on the phone/facetime etc.,

We are willing to raise your offer if you decide to shoot, let me know.

Thank you,

Rob

[beginmodeling.casting@gmail.com](mailto:beginmodeling.casting@gmail.com) or

[Rob@BeginModeling.com](mailto:Rob@BeginModeling.com)

On Tue, May 3, 2016 at 10:06 AM, begin casting <confm-5528213254@nine.craigslist.org> wrote: